

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Martez Darrell Hicks

Case No. Case: 2:24-mj-30336
Assigned To : Unassigned
Assign. Date : 8/12/2024
USA V. HICKS (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 8, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 922(g)(1)	Felon in Possession of a Firearm

This criminal complaint is based on these facts:
See attached affidavit.

☒ Continued on the attached sheet.


Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: August 12, 2024

City and state: Detroit, MI


Complainant's signature

Matthew Kuiack, Special Agent, FBI
Printed name and title



Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Matthew Kuiack, having been duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since July 2019. I am currently assigned to the Detroit field office, assigned to the Violent Gang Task Force (VGTF) and charged with investigating gangs and related activity. Prior to my present assignment, I was a Sheriff's Deputy with the Mitchell County Sheriff's Office, Mitchell County, Kansas.

2. This affidavit is being submitted in support of a criminal complaint alleging that MARTEZ DARRELL HICKS has violated Title 18, USC Section 922(g), "Felon in Possession of a Firearm". Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging HICKS with the above listed violations, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge as well as information provided to me by other law enforcement agents and witnesses.

4. On August 8, 2024, at approximately 10:55 p.m., Detroit Police Department Detective Ryan Walden and Police Officer Quentin Moten were

driving in a fully marked Detroit Police Department scout car in the area of Rex Street and Rossini Street in the City of Detroit, Michigan, which is in the Eastern District of Michigan. Detective Walden and Officer Moten were traveling southbound on Rex Street from Novara Street when Officer Moten observed several individuals standing in the street consuming alcohol. Officer Moten observed HICKS with a heavy object near his right waistband that was consistent with the size and shape of a handgun. Detective Walden parked the marked scout car and Officer Moten exited the vehicle and approached the individuals to investigate open intoxicants and standing in the street while the sidewalk was provided, which are violations of city of Detroit ordinance.

5. As Officer Moten contacted HICKS and began talking to him, HICKS began to blade his body away from Officer HICKS and distance himself while clutching his right side of his waistband with his right hand. Based on Officer Moten's training, experience, and prior arrests, Officer Moten believed HICKS was in possession of a firearm. As Officer Moten closed the distance between himself and HICKS, HICKS began to run northbound. Officer Moten pursued HICKS yelling for HICKS to stop or he was going to be tased. During the chase HICKS was clutching his right hip. Officer Moten deployed his department issued Conducted Energy Weapon on HICKS and observed him fall to the ground. As HICKS fell, Officer Moten observed a black handgun with extended magazine fall

from HICKS' body. HICKS was then detained, and the firearm was recovered by Officer Moten. The firearm was identified as a Glock 45, 9mm, bearing serial number BVDR983. The firearm was collected as evidence by the Detroit Police Department.

6. On June 17, 2019, HICKS was convicted of 18 USC 1962(d) RICO Conspiracy in United States District Court. HICKS was sentenced to 68 months with Federal Bureau of Prisons followed by 36 months of supervised release. On August 8, 2024, when HICKS was contacted by the Detroit Police Department, HICKS was on probation with the United States Probation Office in the Eastern District of Michigan. As a condition of HICKS' probation, HICKS was must not own, possess, or have access to a firearm, ammunition, or destructive weapon.

7. HICKS has been previously convicted of three felonies:

- 2019: United States District Court, 18 USC 1962(d) RICO
Conspiracy

- 2013: 3rd Circuit Court, Detroit for Felony Weapon Carrying
Concealed

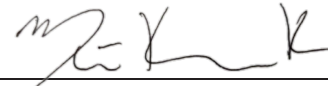
- 2013: 3rd Circuit Court, Detroit for Felony Fleeing Police Officer –
Third Degree

8. On August 9, 2024, Alcohol Tobacco and Firearms (ATF) Special Agent Joshua McLean, an Interstate Nexus Expert, reviewed the history of the above

noted firearm and a preliminary examination indicates that the firearm was most likely manufactured outside the state of Michigan and thus, had traveled and affected interstate commerce.

10. Based on the facts set above, I believe that probable cause exists to believe MARTEZ DARRELL HICKS knowingly possessed a firearm as a felon, in violation of Title 18, U.S.C. Section 922.

Respectfully submitted,



Matthew Kuiack
Special Agent, FBI

Sworn to before me and signed in my presence and/or by reliable electronic means.



HONORABLE KIMBERLY G. ALTMAN
UNITED STATES MAGISTRATE JUDGE

Date: August 12, 2024